

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own motion
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon
New England Inc., d/b/a Verizon Massachusetts'
provision of Special Access Services.

D.T.E. 01-34

**AT&T'S FIRST SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

INFORMATION REQUESTS

1. Please state whether the Verizon provisioning center managed by Steven Cannell or the Verizon provisioning center managed by Nancy McFeeley provisions the following circuits:
 - a. the 376 retail access interstate DS1 circuits for February 2001 (as provided in the supplemental errata to supplemental reply to WCOM/ATT-VZ 1-3); and
 - b. the 6 retail access intrastate DS1 circuits for February 2001 (as provided in the supplemental errata to supplemental reply to WCOM/ATT-VZ 1-3).
2. Please explain and provide all documentation supporting the difference in the circuit counts between:
 - a. the original count for completed retail intrastate DS0 circuits provided in the supplemental reply to WCOM/ATT-VZ 1-3; and
 - b. the revised count for completed retail (non-access) intrastate DS0 circuits provided in the supplemental errata to the supplemental reply to WCOM/ATT-VZ 1-3.

Please reconcile your answer with the following statement provided in response to WCOM/ATT-VZ 3-1(a):

On January 3, 2002, Verizon MA filed revised data on an interstate and intrastate basis for special services (access and non-access) provided by Verizon to Massachusetts retail (end-user) customers...[A]ny changes in the previously filed intrastate (NON-ACCESS) retail data are the result of daily database updates to the Service Order Request Database (SORD) system based on completions from Verizon's billing systems.

Respectfully submitted,

**AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.**

Robert Aurigema, Senior Attorney
AT&T Communications of New
England, Inc.
99 Bedford Street, 4th Floor
Boston, MA 02111

Jeffrey F. Jones, Esq
Kenneth W. Salinger, Esq.
Jay E. Gruber, Esq.
Katherine A. Davenport, Esq.
Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0449

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